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Subject: CEQA Comment on Ocean Bluff Residential Project – Significant Increase in Traffic

Dear Mr. Danna,

I am writing to provide formal comments on the proposed Ocean Bluff Way Residential Project (CASCH# 2024080571) and the forthcoming Draft Environmental Impact Report (DEIR), pursuant to the California Environmental Quality Act (CEQA).

This letter specifically addresses a significant social and environmental impact of the proposed project: a 53% increase in automobile traffic through a small, established neighborhood and its consequent rise in traffic levels, noise and hazards**. [Add something about yourself if you wish**]

Missing Traffic Study a Fatal Defect Under CEQA

From its cul de sac at the north end Orchidia and El Dorado, the Ocean Bluff project will generate 270 car trips per day (or 540 pass-bys). The immediately adjacent streets, Orchidia, El Dorado, and Ocean Bluff Way hold 51 roughly half- to one-acre homes producing an estimated 510 VMTs daily. The Ocean Bluff project will therefore cause a 53% increase in vehicle traffic through the affected neighborhoods, with associated noise and road hazards.

A traffic increase of this scale merits a formal traffic study and plan for mitigation of impacts. Yet the developer was excused from performing a traffic study under an expiring City exemption. Instead, they were instructed to use a five-year-old San Diego County guideline that deemed projects of less than 1000 VMTs as "insignificant." [1] In doing so, the City of Encinitas Engineering Staff

> requested the VMT analysis to be based on the local San Diego Institute of Transportation Engineers (ITE) "Guidelines for Traffic Impact Studies in the San Diego Region", May 2019 [which states] that projects with less than 1,000 Average Daily Traffic (ADT) that are consistent with the zoning are presumed to have less than significant VMT impacts.[2]

Three weeks after the Planning Dept. declared the Ocean Bluff plans to be "deemed submitted," the Encinitas City Council approved a regulation that reduced the previous exemption from 1000 VMTs to 110 VMTs—a whopping 89% reduction. The Council thus codified the outsize impact that new traffic has on Encinitas' compact, long-established neighborhoods, wisely triggering a requirement to study and mitigate those impacts.

The Ocean Bluff Draft Environmental Impact Report under review rubber stamps the presumption that the neighborhood, including its unimproved, narrow feeder streets, will sustain an "insignificant" impact

[1] LOS Engineering Inc., "MULTI-006443-2023 (27 Single Family Homes), 501 Ocean Bluff Way, October 8, 2024, Appendix F, Vehicle Miles Traveled Analysis," p.4.

[2] Ibid, p. 5

from an additional 540 drive-bys per day. This opinion is unsupported by any traffic study whatsoever, or any substantive noise study, and must be rejected. [3]

Notably, the DEIR's Appendix F contains just three half-pages of original text, no original data, and five pages of boilerplate. Including the CEQA requirements for an adequate survey, none of which it satisfies.

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to **make a decision which intelligently takes account of environmental consequences**.... The **courts have looked not for perfection** but for **adequacy**, **completeness**, and a **good faith effort** at full disclosure. CEQA Guidelines, § 15151 (emphasis added)

The Planning Department and developers were presumably aware of the changing Encinitas-based regulation. One wonders why they chose a set of guidelines more appropriate to a major housing development off a San Diego County freeway than to a five-acre infill lot in tiny Encinitas.

As a consequence of the waiver, the surrounding neighborhood and the City are left without any baseline studies for evaluating the project's transportation impacts, nor any plans or options for mitigating the 53% rise in local traffic and its associated congestion, noise and road hazards.

The developer must not be permitted to evade sensible local regulations on a circumstantial technicality. The present and future functionality of our streets and the quality of our community's life require a full and critical study of the project and substantive mitigation plan.

Additionally, since submission, the developers have raised the site's parking allotment to 88 for the homes, plus 15 off street for visitors, compared with the City minimums as being 78.[4] A substantial change involving parking should trigger the requirement of a traffic study per Encinitas regulations.

Significant Traffic, Noise Impacts Will Disproportionately Harm All Neighbors

The traffic and associated noise from Ocean Bluff's planned 27 units will have significant negative impacts on the neighborhood's social character, traffic volume, noise levels, and road safety, from the Orchidia/El Dorado oval to Requeza, Bracero and beyond.

Among homeowners and renters, those most exposed to the street will experience disproportationate impacts, as cars speed past their yards and windows, 540 times per day.Yet all neighbors will suffer from an unnecessary decline in life quality.

Requeza Street is expected to be hardest hit by the Ocean Bluff wave, feeding traffic from Westlake and Encinitas Boulevard. The developer's noise study specifically mentions the expected impact on Requeza but avoids taking measurements.[5]

Bracero will also be hit hard by traffic impacts as drivers use it as a "short cut" from Balour or Santa Fe. Ripple effects will reach the narrow residential streets clustered nearby, especially Melba and Nardo, but also Aloha, Gardena, and others.

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[3] DEIR_4.8-Transportation-May25, p. 4.8-8

[4] It is not clear from the blueprints whether the 15 off-street spots are calculated separately from the required minimums, or if they would raise total parking to 103--35 more than the minimum. At any rate, unit parking has increased a substantive 13%, while total parking including off-street is now 45% over the minimum. Parking figures taken from PASCO, LARET, SUITER & ASSOCIATES / MULTI-006443-2023 / 501 OCEAN BLUFF WAY / OCEAN BLUFF HOMES, 7/3/24, p. 7.

[5] LOS Engineering, Vehicle Miles Traveled Analysis, Appendix F, p. 24.

Social Fabric of Established Neighborhood Will Be Threatened

Owing to its tranquil, beautifully landscaped grounds supported entirely by homeowners, the Orchidia/El Dorado oval is a very popular destination for walkers, runners, families, dogs, cyclists, and others both from within and outside the area, all taking advantage of this exquisite "naturally occurring park." Its sunny streets, wide sidewalks, and ocean views and breezes offer that "third place" to meet and chat with others if one wishes, or simply to decompress and stretch your legs. It is an urban jewel in Encinitas.

Though Requeza and Bracero are less plush looking, they embody the "Old Encinitas" character the community supposedly treasures. And they too are regularly lined with visitors heading up to Orchidia or passing through on this (previously) less-trafficked route.

Significantly, both Requeza and Bracero are heavily used by students walking or biking to four nearby schools: Oak Crest Middle, Ocean Knoll Elementary, San Dieguito Academy, and Sunset High School. They're part of the "Safe Routes to School." Yet neither street offers the minimal safety of a sidewalk nor any designated let alone protected bike lane. The influx of 53% more car traffic will pose a serious risk to all these youngsters.

Existing Street Hazards Will Be Compounded

Two intersections on Requeza pose regular threats to pedestrians, cyclists, and drivers, from frequent speeding and careless turning. Drivers who use Bracero as a shortcut sometimes pop out onto Requeza or run the stop sign altogether. With sight lines looking west blocked by foliage, near-misses with oncoming traffic are common. Drivers heading southeast from Requeza too frequently speed around Bracero's blind corner, brushing its sidewalk-free curb—a habit that could prove deadly should a dogwalker or parents with stroller get in their way.

The Orchidia/Requeza intersection also presents a design hazard, with its wide, curved and sloped corners that do not enforce slowing. Drivers from both Bracero and Requeza sometimes slalom around the turn heedless of oncoming cars or bikes, or of pedestrians crossing. (El Dorado poses a similar hazard, but it sees less traffic at present.)

Without reduced traffic and initiating mitigation efforts, the projected 53% increase traffic from Ocean Bluff will "substantially increase hazards" of the uncontrolled intersections and popular, narrow, sidewalk-free feeder streets.

Project's Inadequate Consideration of Public Safety, Quality of Life, and Social Values

With 27 large homes and 103 planned parking slots (and room for 88 resident vehicles), the Ocean Bluff developers have not undertaken to study, manage or mitigate the impacts from their induced automobile traffic that any competent engineer could quantify.

Because the project has made a substantial change in parking plans, per Encinitas regulations, a thorough traffic study should be mandated. It must review the negative impacts on the immediate neighborhood and feeder streets, from noise, speeding, and hazards generated by the new traffic, on top of existing problems. All of these impacts will degrade the friendly, relaxed social character of the Orchidia/El Dorado oval—an open minded culture native to Encinitas that is increasingly vanishing.

The DEIR must, at minimum:

1. Acknowledge and analyze the project's adverse effects on the neighborhood's traffic volumes, noise exposure, and public safety under CEQA.

2. Evaluate alternatives that would diminish these effects, such as:

- Reducing the number of units.
- Contributing to traffic mitigation projects on streets impacted by its customers.
- Providing alternatives to auto use by improving the existing footpath from Encinitas Boulevard to Ocean Bluff Way. As a public path, it will provide pedestrian access to shops and bus, to reduce auto trips, and support active transit for the wider neighborhood. Residents around San Dieguito will appreciate having an alternative to driving for short trips, especially once Quail Gardens becomes thoroughly congested. In this way, Ocean Bluff can avoid further compounding cumulative negative transportation effects.

3. Traffic mitigation measures could include

- Speed feedback signs, cameras and/or cushions to enforce the 20mph speed limit.
- Intersection bulb outs to prevent corner cutting,
- Educate new residents about Vision Zero and public safety (e.g., a pedestrian hit by car at 20mph has an 80% chance of living, but just 20% at 40mph, plus significant rehab and loss of function).
- Reconfigure Ocean Bluff's private road to align with Orchidia. (See Exhibit 1.) The current, off-center design will require drivers to make two consecutive 90-degree turns to enter or leave the project. This irrational design *will* put pedestrians at constant risk while subjecting neighbors to excessive, unecessary noise and exhaust 1054 times per day. Install stop signs and speed cushions at both the Orchidia and El Dorado thresholds.
- This reconfiguration will allow the public hillside walking path to connect with Ocean Bluff Way, together with the reduced density that is needed to preserve public blue-water views. All residents and passersby will benefit from this change, in contrast to the current design that promises a permanent state of stress, noise and danger. As an example, Exhibit 1 shows the Requeza intersection at Summerview Circle where a housing project's roadway exits directly onto a four-way stop, permitting the rational, orderly movement of vehicles.
- The City should earmark the developers' $2800 per unit traffic mitigation fee specifically for the Ocean Bluff-to-Melba/Nardo neighborhood, prioritizing the most impacted areas first.

Conclusion

The Ocean Bluff project will impose substantial negative impacts on neighborhood traffic, noise and public safety in violation of CEQA's transportation and noise protections. By inducing 53% more car traffic on narrow access roads without mitigation plans, it will cause a "substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project" and "substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections)." All of these "environmental changes will cause substantial indirect adverse effects on human beings."

I urge the City of Encinitas to require a full and honest analysis of these impacts in the DEIR and to reject any version of the project that does not adequately reduce and mitigate threats to neighborhood safety, quality of life, and social character.

Sincerely,

Exhibit 1: Summerview Circle versus Ocean Bluff exits

CEQA Comment on Ocean Bluff Way Residential Project – Significant Increase in Traffic and Noise

Exhibit 1: Safe versus Unsafe Exit Roads from Housing Complexes

Exit drive from the housing complex at Summerview Circle aligns directly with a four-way stop at Regal Road and Requeza Street, permitting safe and orderly passage from all directions.

Orchidia Street intersection with Ocean Bluff Way, April 2025

The current road design for the Ocean Bluff housing project will force drivers to make two 90-degree turns to enter or exit the site. With 270 car trips per day (540 out and back), neighbors will endure the noise and exhaust from 1080 sharp turns each day—similar to living on a freeway ramp.

Some drivers are likely to roll from Orchidia through stop sign to maintain momentum on the short hill, then turn sharply left into the development (whose narrow road will force them to slow). On exiting the project, they will make a sharp right then an immediate sharp left on Orchidia, with no mechanism to slow them down.

The configuration puts pedestrians, cyclists and other drivers at physical risk and subjects neighbors to excessive, unnecessary noise and exhaust.

Moving the project's road to align squarely with the intersection, and installing traffic control measures, can prevent predictable conflicts, crashes, and neighborhood degradation